

H. B. ROBINSON STEAM ELECTRIC PLANT  
Post Office Box 790  
Hartsville, South Carolina 29550

June 5, 1981

Robinson File No: 2-0-4-a-4

Serial:RSEP/81-943

Mr. James P. O'Reilly, Director  
U. S. Nuclear Regulatory Commission  
Region II, Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
RESPONSE TO I.E. INSPECTION REPORT NO. 50-261/81-12

Dear Mr. O'Reilly:

We have received and reviewed the subject report and provide the following response.

Violation - Severity Level V

Technical Specification 6.8.1 requires that written procedures shall be implemented. 10CFR50, Appendix B, Criterion VI, requires control of drawings. Volume 1, Section 9 and Volume 20, Procedure ENG-4 of the Plant Operating Manual, require that measures be established to control the issuance of drawings and drawing changes and assure that these drawings and changes are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, as of April 1, 1981, drawing control procedures were not implemented, resulting in the failure to maintain complete and current drawings for use in the plant, failure to promptly notify holders of controlled drawings of drawing changes, and failure to distribute new or revised drawings reflecting modifications to or installation of operable systems important to safety.

Response

Carolina Power and Light Company acknowledges the violation described above.

On April 1, 1981 drawing control procedures were in effect but were not fully understood by all the personnel responsible for implementing the drawing change program. As a result, holders of controlled drawings were not promptly notified of impending drawing changes. In addition,

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drawings which had been issued before drawing control procedures existed were not properly replaced with new or revised drawings as changes were effected. As a result, holders of controlled drawings did not in all cases have the latest revision of the controlled drawing available to them.

#### Corrective Action

The appropriate personnel were again instructed about the requirements of the drawing control procedures and had the various controls explained to them in detail.

All controlled drawings which have been superceded by later revisions have either been destroyed or holders of these drawings have been formally notified of changes via a Drawing Revision Notification. An effort is now underway to identify all uncontrolled drawings which exist in the plant. These drawings will either be destroyed or marked "For Information Only" by July 18, 1981. The only exceptions to this are the Control Wiring Diagrams (CWD's) in the I&C Shop and the Control and Protection Instrumentation Drawings (Hagan drawings) in the Hagan Room. These drawings will be considered the current and official drawings until such time as the master drawings in the vault can be revised to reflect the as-built condition. This effort is in progress.

#### Action To Prevent Recurrence

Although the drawing control procedures which are now in effect at H. B. Robinson, Unit No. 2 are considered adequate to implement all future drawing revisions, these procedures will be re-reviewed to determine their effectiveness. Any changes which are identified which will improve the effectiveness of the drawing control procedures will be implemented by July 31, 1981.

#### Violation Severity Level V

Technical Specification 6.4.1 requires that a retraining program be maintained that shall meet or exceed the requirements of Appendix A of 10CFR55. 10CFR55, Appendix A, requires that the licensed operator requalification program include preplanned lectures in specified subject areas and formal training and written examination questions on design modifications to ensure licensed operators are cognizant of facility design changes.

Contrary to the above, as of April 1, 1981, an adequate operator requalification training program has not been implemented in that adequate preplanned lectures have not been established or maintained in the required subject areas of normal, abnormal, and Emergency Operating Procedures, Technical Specifications, and 10CFR (applicable sections).

Additionally, adequate formal training and examination on plant design changes has generally not been conducted.

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Response

Carolina Power and Light Company acknowledges the above violation.

Lesson plans in use in the operator requalification training program do not cover all subject areas. Although some formal training has been given on plant design changes, it is recognized that there is room for improvement.

Immediate Corrective Action

As of June 2, 1981, lectures which do not have formal lesson plans will be taught utilizing planned outlines for each day's presentation. The outlines will include the topic subjects, references, length of subject time, objectives and presentation. The general format will be in accordance with already established guidelines (Nuclear and Fossil Operations Training Manual). Additionally, selected plant modifications, plant LER's, and other utility events have been included in the 1981 requalification lecture series. Examination questions on these subjects will be given.

Corrective Action To Prevent Recurrence

More detailed lesson plans, training manuals, audio/visual aids and reference materials are being developed for the RO and SRO Replacement Training Programs. The lesson plans will become the basis for extracting selected topics for the operator requalification program. The first of this additional training material should be available by December 1, 1981, and the remainder by July 1, 1982. In addition, plant design changes and significant utility LER's and events will be included in all future annual requalification examinations.

As indicated above the interim measures (use of planned outlines) have been in effect since June 2, 1981, and the incorporation of all new formal training material should be completed by July 1, 1982.

If you have any questions, please contact me.

Very truly yours,



R. B. Starkey, Jr.  
General Manager

H. B. Robinson S.E. Plant

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R. B. Starkey, Jr., having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

My commission expires:

June 4, 1984

CB/WJF/tm

Susan L. Andrews  
Notary (Seal)

cc: V. Stello (1)